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Filed 07/01/25

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July 1, 2025

## VIA ECF

The Honorable Henry J. Ricardo United States Magistrate Judge Southern District of New York 40 Foley Square New York, New York 10007

Re:

Espinal v. Abine, Inc.; Case No. 1:24-cv-08275-PAE-HJR

Engelmayer:

Dear Judge Ricardo:

We represent Defendant Abine, Inc. ("Defendant") in the above-referenced matter. Together with counsel for plaintiff, we jointly and respectfully move the Court to stay all case deadlines in this action for forty-five (45) days, from July 1, 2025 to August 15, 2025.

The requested stay will permit the parties to finalize their efforts to bring about the voluntary dismissal of all claims asserted in this action without further litigation. Once those efforts are complete, voluntary dismissal will be filed.

Respectfully submitted,

/s/ Karla Del Pozo García

Karla Del Pozo García

GRANTED. The case is hereby stayed for 45 days. The parties are

directed to file a joint status update on August 15, 2025.

All counsel of record (by ECF)

SO ORDERED.

CC:

United States District Judge

Date: July 1, 2025

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